

		disposition of the subject products, the various defaults under the obligations subject of this suit, and the balances owed.	
Shanna M. Kaminski	c/o Kaminski Law, PLLC Shanna M. Kaminski P.O. Box. 725220 Berkley, MI 48072 (248) 462-7111	Ms. Kaminski will testify via narrative regarding the attorney's fees incurred in this matter by Plaintiff.	15 minutes

Possible Witnesses

Witness Name	Address	Testimony	Time Length
Jeffrey A. Mitchell	Unknown (will supplement if able)		
Brandon J. Gibbons	420 Throckmorton St. Suite 1210 Fort Worth, TX 76102	Mr. Gibbons will testify via narrative regarding the attorney's fees incurred in this matter by Plaintiff.	15 minutes
Mark W. Stout	420 Throckmorton St. Suite 1210 Fort Worth, TX 76102	Mr. Stout will testify via narrative regarding the attorney's fees incurred in this matter by Plaintiff.	15 minutes

Expert Witnesses

Witness Name	Address	Testimony	Time Length
Brandon J. Gibbons	420 Throckmorton St. Suite 1210 Fort Worth, TX 76102	Expert testimony will be on fees.	15 minutes
Mark W. Stout	420 Throckmorton St. Suite 1210 Fort Worth, TX 76102	Expert testimony will be on fees.	15 minutes
Shanna M. Kaminski	c/o Kaminski Law, PLLC Shanna M. Kaminski P.O. Box. 725220 Berkley, MI 48072 (248) 462-7111	Ms. Kaminski will testify via narrative regarding the attorney's fees incurred in this matter by Plaintiff.	15 minutes

Record Custodians

Witness Name	Address	Testimony	Time Length
Jonathan Birnbach	c/o Kaminski Law, PLLC Shanna M. Kaminski P.O. Box. 725220 Berkley, MI 48072 (248) 462-7111	Mr. Birnbach will testify regarding the underlying business relationship between the parties, the relevant invoices and memorandums as well as the amounts due and owing, the default by the Defendants, and conversations between the parties. Further, Mr. Birnbach will testify regarding Plaintiff's damages and the need to hire and pay counsel. Mr. Birnbach will prove up the applicable documents and business records.	4-5 hours

Plaintiff further cross-designates any and all individuals and/or corporate representatives of any entities designated by the Defendants, regardless of whether such witness designation is made solely for rebuttal or for other purposes. Additionally, Plaintiff reserves the right to supplement or amend as needed within the confines of the Federal Rules of Civil Procedure and reserves the right to call witnesses in rebuttal.

Dated: December 18, 2023

Respectfully Submitted,

PADFIELD & STOUT, L.L.P.

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/s/ Brandon J. Gibbons

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing has been forwarded to the counsel of record via e-service on December 18, 2023.

/s/ Brandon J. Gibbons

Brandon J. Gibbons